

EXHIBIT 5



RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

From Olivia Flechsig <oflechsig@amglaw.com>

Date Thu 9/5/2024 1:53 PM

To Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>

Dear Sarah,

That will be fine regarding the timing of Ms. Tse's and Mr. Powers' depositions.

We will agree to your request to stipulate to a December 5, 2024 hearing deadline with a new opposition deadline of October 17, and reply date of October 24. However, we specifically do not intend for this to disturb our trial or pretrial filing dates, and we request that when you prepare the stipulation for our review, you describe the reason for this second continuation (i.e. that you finally heard from Dr. Asekomeh and he is off rotation for this month until October 1, 2024).

Best,
Olivia

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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, September 5, 2024 12:43 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

Thanks for the call today. This email confirms that Mr. Powers and Ms. Tse's depositions can start at 9:00 a.m. PT, but Ms. Tse has a hard stop at 1:45 p.m. PT. If this will be an issue, we should start Ms. Tse's deposition earlier.

We also discussed that Dr. Eshiofe Asekomeh will not be available for his deposition until after September 30th, and we are looking into his first available dates of deposition. Pending our client's approval, we are proposing a continuance of the MSJ hearing and motion hearing deadline to December 5, 2024, which would set Plaintiff's opposition date on October 17, and Defendant's reply date on October 24. Please let me know at your earliest convenience whether this schedule will work for your office.

I will get back to you later today regarding Defendant's supplemental expert disclosure.

Thanks,
-Sarah

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From: Olivia Flechsig <oflechsig@amglaw.com>
Sent: Wednesday, September 4, 2024 11:13 AM
To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Apologies, I spoke with Ms. Leal who is going to take Mr. Powers' deposition, and she let me know that his deposition should not take the entire business day either. We would like to please start at 9:00 am pacific time and will commit to getting Mr. Powers out at a reasonable hour the same day. Please confirm that we will start at 9:00 am Pacific for both Mr. Powers and Ms. Tse.

Thanks,
Olivia

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From: Olivia Flechsig
Sent: Wednesday, September 4, 2024 9:40 AM
To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Good Morning,

Those dates will work for us, and we will plan to start Dr. Eshiofe's depo at 7:00 am Pacific and Mr. Powers' at 7:00 am Pacific.

For Ms. Tse, we anticipate no more than a half day, so if we could start at 9 am Pacific, I think we can safely plan to be still finished by 2 pm Pacific time. Let us know.

Best,
Olivia

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From: Sarah Fan <SFan@sheppardmullin.com>
Sent: Tuesday, September 3, 2024 5:19 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

Thank you for following up. We are working on the witnesses' first available deposition dates, and we are waiting on certain confirmations. In the meantime, we'd appreciate if you could let us know as soon as possible whether these dates work for your office:

- **September 13** – Thalia Tse (pending final confirmation, which I hope to receive shortly)
- **September 17** – Andrew Powers
- **September 18** – Dr. Eshiofe Asekomeh (pending confirmation)

Ms. Tse and Mr. Powers are located in Houston, Texas (Central Time). Their schedules are limited by the time difference, so we propose starting at 7AM (PT) to ensure that we can complete their depositions the same day.

Dr. Asekomeh is located in Warri, Nigeria (West Africa Time), which is 8 hours ahead. We are working to confirm his availability on September 18th, subject to the time difference and his patient obligations. The earlier we can start his deposition (Pacific Time), the better. 7:00 a.m. (PT) is the equivalent of 3:00 PM (WAT).

Please let us know your thoughts regarding the above at your earliest convenience. Defendant will agree to supplement its expert witness disclosures, and we will get back to you regarding those.

Thanks,
-Sarah

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Tuesday, September 3, 2024 1:19 PM

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Cc: Angie Paz <apaz@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Good Afternoon,

I'm writing to follow-up about the outstanding items, including scheduling the depositions of Ms. Tse, Mr. Powers, and Dr. Asekomeh for September 9, 11, 12, or 13. We still not heard back from you in this regard. Also, we are still waiting to hear back about whether Chevron will supplement its expert witness disclosures as requested and if so, when.

Last, since Judge Hernan has not yet ruled on our Joint Stipulation to Continue the September 19, 2024 Expert Discovery Cut-Off and October 29, 2024 Motion Hearing Deadline, we will plan to file an Ex Parte application for same tomorrow. Please confirm by tomorrow at 12 pm Pacific Time that you would not oppose such an ex parte application.

Best,
Olivia

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From: Dolores Leal <dleal@amglaw.com>

Sent: Friday, August 30, 2024 3:13 PM

To: Sarah Fan <SFan@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hi Sarah,

Following up with respect to the depositions of Mr. Powers, Dr. Asekomeh, and Ms. Tse. Olivia advised you that we are available on September 9, 11, 12, and 13. Please let us know asap what dates are available to each.

Thank you.

Dolores Y. Leal
Pronouns: she/her
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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, August 29, 2024 7:33 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

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Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hi Olivia:

Yes, please do.

Thank you,
-Sarah

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, August 29, 2024 7:31 PM

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Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Sarah,

To absolutely confirm, is it okay if I e-sign your name to it (with Linda removed from the caption)?

Get [Outlook for iOS](#)

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, August 29, 2024 7:24:09 PM

To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: Re: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Thanks so much for getting back to me, I'll make that change and file it when I get home this evening.

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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, August 29, 2024 7:01:25 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

The Stipulation looks good. Could you please remove Linda Shen from the caption? Aside from that we have no other changes.

Thanks,
-Sarah

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, August 29, 2024 4:20 PM

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Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Counsel,

To clarify, we ask that you please get back to us about any changes so we can file it **today**, to hopefully allow Judge Vera to rule on it before the weekend.

Thank you, and as always feel free to give me a call to discuss.

Olivia

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From: Olivia Flechsig
Sent: Thursday, August 29, 2024 3:14 PM
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Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Dear Sarah,

That will be fine with us so long as we will be able to take Mr. Powers', Dr. Asekomeh's, and Ms. Tse's deposition in the next two weeks. As of right now, we are available on September 9, 11, 12, and 13, so please let us know when we could depose them in that range.

Please find attached 1) the draft stipulation to the continuances, 2) draft proposed order, and 3) my draft declaration and Exhibit A in support thereof. Please let me know of any suggested changes you have ASAP, as we would like to finalize and file it before this holiday weekend.

With respect to the stipulation to dismissal, I hope to get you a draft next week.

Best,
Olivia

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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, August 29, 2024 2:06 PM

To: Olivia Flechsig <oflechtsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

During our call we discussed setting the hearing on either November 14th or 21st. I don't recall that we discussed that there was a conflict, so I only have authority to agree to a continuance to November 14th. With the Thanksgiving holiday shortly after, the hope is that a slightly earlier hearing date will give us a better chance of receiving the court's ruling on the motion before the parties' pretrial submissions are due.

-Sarah

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From: Olivia Flechsig <oflechtsig@amglaw.com>

Sent: Thursday, August 29, 2024 1:17 PM

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Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Oh I see. Is there a reason we can't plan to have the hearing on November 21, 2024? As it stands I have an important hearing on another matter in Orange County on November 14th.

Best,
Olivia

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From: Sarah Fan <SFan@sheppardmullin.com>
Sent: Thursday, August 29, 2024 12:16 PM
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Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Thanks, Olivia. Based on a hearing date of November 14th, Defendant's Reply would be due on October 3rd, and Plaintiff's Opposition would be due on September 26th.

-Sarah

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From: Olivia Flechsig <oflechtsig@amglaw.com>
Sent: Thursday, August 29, 2024 12:13 PM
To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Thank you for letting us know. I will work on drafting those items and will send as soon as I have them. Can you also please confirm that our new deadline for our opposition to Chevron's Motion for Summary Judgment will be October 3, 2024?

Best,
Olivia

Olivia Flechsig, Esq.

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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, August 29, 2024 12:06 PM

To: Olivia Flechsig <oflechtsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

To follow up, Defendant will agree to waive its costs in exchange for Plaintiff's dismissal of the age discrimination claim with prejudice. Additionally, we are agreeable to continuing the MSJ hearing date to November 14, 2024, and the expert discovery cutoff date to October 10, 2024.

Could you please prepare a stipulation on these items and forward for our review? We will get back to you regarding the remainder of the matters addressed in your emails below.

Thank you,
-Sarah

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From: Olivia Flechsig <oflechtsig@amglaw.com>

Sent: Thursday, August 29, 2024 9:55 AM

To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Good Morning Counsel,

Please let us know your position by noon today so we can plan accordingly.

Best,
Olivia

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From: Olivia Flechsig
Sent: Wednesday, August 28, 2024 2:20 PM
To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Dear Sarah,

Yes, we would be willing to stipulate to not take Ms. Lott's deposition if we reach a stipulation as to dismissing Mr. Snookal's age discrimination claim.

Best,
Olivia

From: Sarah Fan <SFan@sheppardmullin.com>
Sent: Wednesday, August 28, 2024 1:55 PM
To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

Thank you for your emails below. We reached out to our client yesterday to discuss authorization on the matters below. We understand the time-sensitive nature of this discussion and are doing our best to get back to you as soon as possible.

As an additional note to the below, we discussed on our call that Plaintiff would not need to take Gia Lott's deposition if the age discrimination was dismissed. Can you please confirm that is the case?

Thank you,
-Sarah

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From: Olivia Flechsig <oflechsig@amglaw.com>
Sent: Tuesday, August 27, 2024 5:08 PM
To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>
Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>
Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Dear Counsel,

Apologies for the second email, but I forgot to note that I also proposed a related stipulated continuance of the close of expert discovery since the current deadlines give us less than a month between the initial disclosures that were on August 20, 2024 and close of expert discovery which is set for September 17, 2024. I suggested October 3rd as the new deadline for close of expert discovery, but perhaps October 10th would make more sense. Please let us know your position on this as well.

Thank You,
Olivia

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From: Olivia Flechsig

Sent: Tuesday, August 27, 2024 3:44 PM

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Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Dear Sarah,

Thank you for speaking with us today. I'm writing to memorialize our discussion to make sure we're on the same page about the outstanding information we need from Chevron.

We completed our meet and confer obligations regarding Defendant's motion for summary judgment. Plaintiff will be opposing the motion in its entirety, though you said you will be getting back to us about whether Chevron is interested in stipulating to dismiss Mr. Snookal's age discrimination claim in exchange for a waiver of costs and fees.

I also shared our proposal to stipulate to continue the existing October 29, 2024 deadline to hear motions to Thursday, November 21, 2024. This should allow Defendant's MSJ to be heard on that same day. This would create a new reply deadline for Chevron of October 10, 2024 (i.e. 42 days before the hearing), and we would ask that our opposition deadline be October 3, 2024.

If we are unable to reach an agreement to continued dates for the hearing on the MSJ, Plaintiff will move on an ex parte basis for same. This continuance is required to avoid prejudice to Plaintiff, since all but one of Chevron's witnesses has been made unavailable to us for depositions through no fault of our own. I noticed the depositions of Dr. Eshiofe Asekomeh, Gia Lott, Thalia Tse, and Andrew Powers back on July 11, 2024, and have sent several subsequent emails seeking the deponents' availability to no avail. To date, Chevron has not provided any availability for Dr. Asekomeh, Ms. Tse, or Mr. Powers. Ms. Lott's deposition, which we had had on calendar for weeks, was also just continued by Mr. Mussig as of last week. Further, I noted that both Dolores and I have another trial scheduled to go on October 24, 2024, which conflicts with the current MSJ hearing date that Chevron selected.

Last, I outlined the deficiencies in Defendant's expert witness disclosures and requested that you supplement them to bring them into compliance with FRCP 26(a)(2). As it stands, Chevron's disclosures provided neither "the subject matter on which the witness is expected to present evidence under Federal Rule of Evidence 702, 703, or 705" nor the "summary of the facts and opinions to which the witness is expected to testify" for any of the witnesses listed. (FRCP 26(a)(2)(c)). Also for Dr. Victor Adeyeye, Chevron did not provide a phone number as required, and for Dr. Ujomoti Akintunde, Chevron provided neither a phone number or address, providing only her city and country.

Relatedly, please also let us know whether you will be representing all of Chevron's experts and confirm that you will accept notices of deposition on their behalf.

Given our rapidly-approaching MSJ opposition deadline, **we ask that you please respond with Chevron's position on the outstanding issues no later than tomorrow by close of business.** If you need to reach me to discuss before then, you are welcome to call me on my

cell at (408) 206-1702.

Best,
Olivia

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From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Monday, August 26, 2024 3:15 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Hello Olivia:

There appears to be a typo in the hearing date – it will be set for October 24, 2024. A corrected copy of the Notice is attached.

We will get back to you as soon as possible regarding a time to confer regarding the motion.

Thanks,
-Sarah

Sarah Fan | Associate
SheppardMullin | Los Angeles
+1 213-617-5549 | direct

From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Monday, August 26, 2024 3:07 PM

To: Sarah Fan <SFan@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

Dear Counsel,

We are available to meet and confer about this matter most any time tomorrow (Tuesday 8/27), or this Wednesday 8/28 after 9:30 am pacific time. Please let us know a good time in that range, and I can circulate a call in number.

We will need to discuss the substance of the motion, but also that the hearing date listed in the Notice of Motion is October 27, 2024, which is a Sunday. Please let us know what the correct hearing date is ASAP so we can plan accordingly. Relatedly, we would like to discuss a stipulated deadline for our opposition papers. Per the Court's standing order, "[t]he parties may stipulate to a modified schedule that is reasonable for all parties. Any briefing schedule must provide the Court at least forty-two (42) days between the Reply deadline and the hearing date."

Best,
Olivia

Olivia Flechsig, Esq.
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Boulevard, Suite 1500
Los Angeles, CA 90048
(323) 653-6530
(323) 653-1660, Facsimile

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305 Broadway, Suite 607
New York, NY 10007
www.amglaw.com
oflechsig@amglaw.com

From: Sarah Fan <SFan@sheppardmullin.com>

Sent: Thursday, August 22, 2024 10:43 PM

To: Olivia Flechsig <oflechsig@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Josie Pena <jpena@amglaw.com>; Angie Paz <apaz@amglaw.com>

Cc: Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>

Subject: Snookal, Mark v. Chevron U.S.A., Inc. | Defendant's Motion for Summary Judgment

I'm using Mimecast to share large files with you. Please see the attached instructions.

Counsel:

Pursuant to the Court's Civil Standing Order, please see the following documents which constitute Defendant Chevron U.S.A. Inc.'s moving papers in support of its Motion for Summary Judgment or, in the Alternative, Motion for Partial Summary Judgment:

1. NOTICE OF DEFENDANT CHEVRON U.S.A., INC.'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT
2. JOINT BRIEF RE DEFENDANT CHEVRON U.S.A. INC.'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT
3. DEFENDANT CHEVRON U.S.A. INC.'S STATEMENT OF UNCONTROVERTED FACTS AND GENUINE DISPUTES IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT
4. JOINT APPENDIX OF DECLARATIONS AND WRITTEN EVIDENCE RE DEFENDANT CHEVRON U.S.A. INC.'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT
5. [PROPOSED] JUDGMENT GRANTING DEFENDANT CHEVRON U.S.A. INC.'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT

We have also attached a zipped folder containing the declarations and written evidence referenced in Defendant's Joint Appendix – there are 23 documents (5 declarations and 18 exhibits) in total. Please let us know as soon as possible if you are missing or have difficulty accessing any of these documents.

Once you have had an opportunity to review Defendant's moving papers, please let us know your availability to meet and confer regarding Defendant's Motion for Summary Judgment. Pursuant to the local rules, we are required to meet and confer on or before September 5, 2024.

Thank you,
-Sarah

Sarah Fan | Associate
+1 213-617-5549 | direct
SFan@sheppardmullin.com | [Bio](#)

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